

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

MAY 29 2024

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

4:24-cr-00261 MTS/SPM

GENARO ROSAS-VARGAS

a/k/a "Chilango"

and "Alejandro Toledo-Perez"

and "Daniel Torres-Ramirez"

and "Angel Garcia,"

JAVIER RAMOS-GARCIA,

JOSE CORONEL-COSS

a/k/a "Sebastian Coronel,"

THEODORE SIGITE,

CHRISTINA NIFONG,

JANELLE BRENNING,

ALLEN HOKE,

RAFAEL CARO-CANCEL

a/k/a "Tank" and "Cheeseburger,"

AIMEE BARRON-GUADALUPE,

STEVEN NEIRA a/k/a "Steven Perilla",

JEREMY JONES,

ALLEN WALKER,

ANICETO HERNANDEZ-SALINAS

a/k/a "Brother-in-Law" and "Chester"

ANDRES TABIMA-CORDOBA,

RAMONA GARCIA-ARREOLA,

GERALD BIRCHFIELD a/k/a "Jerry,"

MARTIN LOPEZ-CHUN,

JOSUE LOPEZ-DELANGEL,

RENE GOMEZ-LOZANO,

RYAN MULLINS,

ANGEL NIEVES,

WILLIAM PAEPER a/k/a "Bill,"

JULIUS PHILLIPS,

RONNIE STONE,

CRISPIN VELAZQUEZ-SOTO,

ENRIQUE WALL a/k/a "Henry Wall,"

RONALD PAXTON,

ADOLFO SOTELO-PEREZ, and

ELOISA VILLAGAS-VALENCIA,

Counts I, II

Counts I, II, X, XI, XIII, XV, XVI, XVII,
XVIII, XX, XXI

Counts I, II, XIX

Counts I, II, III, V, VI, VII, VIII

Counts I, IV

Counts I, VIII

Counts I, IX

Counts I, II, XII

Counts I, II, XIV

Counts I, XIX

Counts I, XXII, XXIII, XXIV

Counts I, XXV

Counts I, XXVI, XXVII

Counts I, XXVIII

Counts I, II, XXIX

Count I

Count I

Count I

Count I

Count I

Count I

Count I

Count I

Count I

Count I

Count I

Counts I, II

Counts I, II

Counts I, II

Defendants.

INDICTMENT

COUNT I

The Grand Jury charges that:

A. Beginning at a time unknown but including 2017 to on or about the date of this

Indictment, in the Eastern District of Missouri, and elsewhere,

**GENARO ROSAS-VARGAS
a/k/a “Chilango” and “Alejandro Toledo-Perez”
and “Daniel Torres-Ramirez” and “Angel Garcia”,
JAVIER RAMOS-GARCIA,
JOSE CORONEL-COSS
a/k/a “Sebastian Coronel”,
THEODORE SIGITE,
CHRISTINA NIFONG,
JANELLE BRENNING,
ALLEN HOKE,
RAFAEL CARO-CANCEL
a/k/a “Tank” and “Cheeseburger”,
AIMEE BARRON-GUADALUPE,
STEVEN NEIRA
a/k/a “Steven Perilla”,
JEREMY JONES,
ALLEN WALKER,
ANICETO HERNANDEZ-SALINAS
a/k/a “Brother-in-Law” and “Chester”,
ANDRES TABIMA-CORDOBA,
RAMONA GARCIA-ARREOLA,
GERALD BIRCHFIELD
a/k/a “Jerry”,
MARTIN LOPEZ-CHUN,
JOSUE LOPEZ-DELANGEL,
RENE GOMEZ-LOZANO,
RYAN MULLINS,
ANGEL NIEVES,
WILLIAM PAEPER
a/k/a “Bill”,
JULIUS PHILLIPS,
RONNIE STONE,
CRISPIN VELAZQUEZ-SOTO,
ENRIQUE WALL
a/k/a “Henry Wall”,
RONALD PAXTON,
ADOLFO SOTELO-PEREZ, and
ELOISA VILLAGAS-VALENCIA**

the defendants herein, did knowingly combine, conspire, agree, and confederate together with each other and with other persons known and unknown to the Grand Jury, to distribute and to possess with the intent to distribute Schedule II controlled substances including fentanyl, cocaine, and methamphetamine, in violation of Title 21, United States Code, Section 841(a)(1), all in violation of Title 21, United States Code, Section 846.

Quantity of Fentanyl, Cocaine and or Methamphetamine Involved in the Conspiracy

1. With respect to Defendant **Genaro Rosas-Vargas, a/k/a “Chilango” and “Alejandro Toledo-Perez” and “Daniel Torres-Ramirez” and “Angel Garcia”**, the amount of fentanyl involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to this defendant is four hundred (400) grams or more of fentanyl, thereby making the offense punishable under Title 21, United States Code, Section 841(b)(1)(A); and

2. With respect to Defendant **Genaro Rosas-Vargas, a/k/a “Chilango” and “Alejandro Toledo-Perez” and “Daniel Torres-Ramirez” and “Angel Garcia”**, the amount of cocaine involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to this defendant is five (5) kilograms or more of cocaine, thereby making the offense punishable under Title 21, United States Code, Section 841(b)(1)(A).

3. With respect to Defendants **Genaro Rosas-Vargas a/k/a “Chilango” and “Alejandro Toledo-Perez” and “Daniel Torres-Ramirez” and “Angel Garcia”, Javier Ramos-Garcia, Rafael Caro-Cancel a/k/a “Tank” and “Cheeseburger”, Theodore Sigite,**

Martin Lopez-Chun, Crispin Velasquez-Soto, Aniceto Hernandez-Salinas a/k/a “Brother-in-Law” and “Chester”, Ramona Garcia-Arreola, and Christina Nifong, the amount of methamphetamine involved in the conspiracy attributable to each of these defendants as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to each of these defendants is five hundred (500) grams or more of methamphetamine, thereby making the offense punishable under Title 21, United States Code, Section 841(b)(1)(A).

4. With respect to Defendant **Jeremy Jones**, the amount of fentanyl involved in the conspiracy attributable to his own conduct, and the conduct of other conspirators reasonably foreseeable to him is forty (40) grams or more of fentanyl, thereby making the offense punishable under Title 21, United States Code, Section 841(b)(1)(B).

5. With respect to Defendant **Javier Ramos-Garcia and Jose Coronel-Coss a/k/a “Sebastian Coronel”** the amount of cocaine involved in the conspiracy attributable to each of these defendants as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to each of these defendants is five hundred (500) grams or more of cocaine, thereby making the offense punishable under Title 21, United States Code, Section 841(b)(1)(B).

6. With respect to Defendant **Allen Hoke**, the amount of methamphetamine involved in the conspiracy attributable to his own conduct, and the conduct of other conspirators reasonably foreseeable to him is fifty (50) grams or more of methamphetamine, thereby making the offense punishable under Title 21, United States Code, Section 841(b)(1)(B).

COUNT II

The Grand Jury further charges that:

Beginning at a time unknown but including 2017, and continuing to on or about the date of this indictment, with the exact dates unknown to this Grand Jury, in the Eastern District of Missouri and elsewhere,

**GENARO ROSAS-VARGAS
a/k/a “Chilango” and “Alejandro Toledo-Perez”
and “Daniel Torres-Ramirez” and “Angel Garcia”,
JAVIER RAMOS-GARCIA,
JOSE CORONEL-COSS
a/k/a “Sebastian Coronel”,
THEODORE SIGITE,
RAFAEL CARO-CANCEL
a/k/a “Tank” and “Cheeseburger”,
AIMEE BARRON-GUADALUPE,
RAMONA GARCIA-ARREOLA,
RONALD PAXTON,
ADOLFO SOTELO-PEREZ,
ELOISA VILLAGAS-VALENCIA,**

the defendants herein, knowingly combined, conspired, or confederated with others known and unknown to this Grand Jury, to knowingly engage and attempt to engage in offenses against the United States in violation of Title 18 USC Section 1956, to wit:

(a) to knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity that is, conspiracy to distribute and possess with the intent to distribute controlled substances in violation of Title 21, United States Code, Sections 841(a)(1) and 846 as charged in Count I, with the intent to promote the carrying on of the specified unlawful activity, and that while conducting and attempting to conduct such financial transaction, knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity in violation of Title 18, United States Code Section 1956(a)(1)(A)(i); and

proceeds of some form of unlawful activity in violation of Title 18, United States Code Section 1956(a)(1)(A)(i); and

(b) to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, that is, conspiracy to distribute and possess with the intent to distribute controlled substances in violation of Title 21, United States Code Sections 841 (a)(1) and 846 as charged in Count I, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership and control of the

proceeds of the specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew the property involved in the financial transactions represented the proceeds of some unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

MATTER AND MEANS OF THE CONSPIRACY

1. Beginning at a time unknown but including 2017, and continuing through May 2024, Defendant **Genaro Rosas-Vargas a/k/a “Chilango” and “Alejandro Toledo-Perez” and “Daniel Torres-Ramirez” and “Angel Garcia”**, was a Mexican based broker obtaining large quantities of fentanyl, cocaine, and methamphetamine through cartel connections and had delivered to the St. Louis Metropolitan area and elsewhere for a number of large-scale drug traffickers including defendants **Javier Ramos-Garcia, Jose Coronel-Coss a/k/a “Sebastian Coronel,” and Theodore Sigite.**

2. In furtherance of the money laundering conspiracy defendant **Genaro Rosas-Vargas a/k/a “Chilango” and “Alejandro Toledo-Perez” and “Daniel Torres-Ramirez” and “Angel Garcia,”** utilized and directed couriers including defendants **Theodore Sigite,**

Rafael Caro-Cancel a/k/a “Tank” and “Cheeseburger,” Ronald Paxton, Aimee Barron-Guadalupe, Adolfo Sotelo-Perez, Ramona Garcia-Arreola, and Eloisa Villegas-Valencia to transport bulk amounts of United States Currency constituting drug proceeds from places known and unknown to the grand jury, including the Eastern District of Missouri to the Southern District of Texas, into Mexico to finance the purchase of one or more controlled substances from one or more sources of supply in Mexico. The use of cash allowed the drug trafficking organization to conceal and disguise in whole or in part the nature, location, source, ownership and control of the proceeds of the specified unlawful activity.

3. In furtherance of the money laundering conspiracy defendant, **Genaro Rosas-Vargas a/k/a “Chilango” and “Alejandro Toledo-Perez” and “Daniel Torres-Ramirez” and “Angel Garcia”** utilized and directed subjects including defendants **Javier Ramos-Garcia, Jose Coronel-Coss a/k/a “Sebastian Coronel”, Theodore Sigite, and Ramona Garcia-Arreola** to wire money constituting drug proceeds to locations in Mexico to finance the purchase of one or more controlled substances. The wires would often be wired in the names of other subjects in order to conceal and disguise in whole or in part that nature, location, source, ownership and control of these drug proceeds.

COUNT III

The Grand Jury further charges that on or about February 16, 2023, in the City of St. Louis, within the Eastern District of Missouri,

THEODORE SIGITE,

the defendant herein, did knowingly and intentionally possess with the intent to distribute methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

The amount of methamphetamine distributed by defendant **Theodore Sigite** was 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, thereby making the offense punishable under Title 21, United States Code, Section 841(b)(1)(A).

COUNT IV

The Grand Jury further charges that on or about February 22, 2023, in the City of St. Louis, within the Eastern District of Missouri,

CHRISTINA NIFONG,

the defendant herein, did knowingly and intentionally distribute methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

The amount of methamphetamine distributed by defendant **Christina Nifong** was 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, thereby making the offense punishable under Title 21, United States Code, Section 841(b)(1)(A).

COUNT V

The Grand Jury further charges that on or about May 8, 2023, in the City of St. Louis, within the Eastern District of Missouri,

THEODORE SIGITE,

the defendant herein, did knowingly and intentionally possess with the intent to distribute methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT VI

The Grand Jury further charges that on or about May 8, 2023, in the City of St. Louis, within the Eastern District of Missouri,

THEODORE SIGITE,

the defendant herein, knowingly possessed a firearm, to wit: a Smith and Wesson .380 semi-automatic pistol, in furtherance of a drug trafficking offense which may be prosecuted in a court of the United States, that is, conspiracy to possess with the intent to distribute Schedule II controlled substances including cocaine as charged in Count I, and possession with the intent to distribute methamphetamine, a Schedule II controlled substance, as charged in Count V, in violation of Title 18, United States Code, Section 924(c)(1).

COUNT VII

The Grand Jury further charges that on or about May 8, 2023, in the City of St. Louis, within the Eastern District of Missouri,

THEODORE SIGITE,

the defendant herein, knowing that he had been previously convicted in a court of law of a crime punishable by a term of imprisonment exceeding one year, knowingly possessed a firearm, to wit: a Smith and Wesson .380 semi-automatic pistol, that had traveled in interstate or foreign commerce during or prior to being in defendant's possession in violation of Title 18, United States Code, Section 922(g)(1).

COUNT VIII

The Grand Jury further charges that on or about May 9, 2023, in the City of St. Louis, within the Eastern District of Missouri,

**JANELLE BRENNING, and
THEODORE SIGITE**

the defendant herein, did knowingly and intentionally possess with the intent to distribute methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT IX

The Grand Jury further charges that on or about May 10, 2023, in the City of St. Louis, within the Eastern District of Missouri,

ALLEN HOKE,

the defendant herein, did knowingly and intentionally possess with the intent to distribute methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

The amount of methamphetamine possessed by defendant **Allen Hoke** was 50 grams or more of a mixture of substance containing a detectable amount of methamphetamine, thereby making the offense punishable under Title 21, United States Code, Section 841(b)(1)(B).

COUNT X

The Grand Jury further charges that on or about May 24, 2023, in the City of St. Louis, within the Eastern District of Missouri,

JAVIER RAMOS-GARCIA,

the defendant herein, did knowingly and intentionally distribute methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

The amount of methamphetamine distributed by defendant **Javier Ramos-Garcia** was 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, thereby making the offense punishable under Title 21, United States Code, Section 841(b)(1)(B).

COUNT XI

The Grand Jury further charges that on or about May 31, 2023, in the City of St. Louis, within the Eastern District of Missouri,

JAVIER RAMOS-GARCIA,

the defendant herein, did knowingly and intentionally distribute methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

The amount of methamphetamine distributed by defendant **Javier Ramos-Garcia** was 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, thereby making the offense punishable under Title 21, United States Code, Section 841(b)(1)(A).

COUNT XII

The Grand Jury further charges that on or about June 16, 2023, in St. Charles County, within the Eastern District of Missouri,

RAFAEL CARO-CANCEL,
a/k/a “Tank” and “Cheeseburger,”

the defendant herein, did knowingly and intentionally distribute methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

The amount of methamphetamine distributed by defendant **Rafael Caro-Cancel** was 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, thereby making the offense punishable under Title 21, United States Code, Section 841(b)(1)(B).

COUNT XIII

The Grand Jury further charges that on or about June 28, 2023, in St. Charles County, within the Eastern District of Missouri,

JAVIER RAMOS-GARCIA,

the defendant herein, did knowingly and intentionally distribute methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

The amount of methamphetamine distributed by defendant **Javier Ramos-Garcia** was 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, thereby making the offense punishable under Title 21, United States Code, Section 841(b)(1)(B).

COUNT XIV

The Grand Jury further charges that:

On or about June 29, 2023, in St. Charles County, Missouri, within the Eastern District of Missouri, and elsewhere,

AIMEE BARRON-GUADALUPE,

the defendant herein, did travel in interstate commerce with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, that is, drug trafficking, in violation of Title 21, United States Code, Section 841(a)(1), and thereafter performed and attempted to perform an act to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of such unlawful activity, to wit: the receipt, possession, and concealment of \$96,960 dollars in United States currency,

In violation of Title 18, United States Code, Section 1952.

COUNT XV

The Grand Jury further charges that on or about July 12, 2023, in St. Louis County, within the Eastern District of Missouri,

JAVIER RAMOS-GARCIA,

the defendant herein, did knowingly and intentionally distribute methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

The amount of methamphetamine distributed by defendant **Javier Ramos-Garcia** was 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, thereby making the offense punishable under Title 21, United States Code, Section 841(b)(1)(A).

COUNT XVI

The Grand Jury further charges that on or about July 21, 2023, in St. Charles County, within the Eastern District of Missouri,

JAVIER RAMOS-GARCIA,

the defendant herein, did knowingly and intentionally distribute fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT XVII

The Grand Jury further charges that on or about July 28, 2023, in St. Charles County, within the Eastern District of Missouri,

JAVIER RAMOS-GARCIA,

the defendant herein, did knowingly and intentionally distribute fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT XVIII

The Grand Jury further charges that on or about August 14, 2023, in St. Louis County, within the Eastern District of Missouri,

JAVIER RAMOS-GARCIA,

the defendant herein, did knowingly and intentionally distribute fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

The amount of fentanyl distributed by defendant **Javier Ramos-Garcia** was 400 grams or more of a mixture or substance containing a detectable amount of fentanyl, thereby making the offense punishable under Title 21, United States Code, Section 841(b)(1)(A).

COUNT XIX

The Grand Jury further charges that on or about August 23, 2023, in St. Charles County, within the Eastern District of Missouri,

**JOSE CORONEL-COSS
a/k/a “Sebastian Coronel” and
STEVEN NEIRA
a/k/a “Steven Perilla”**

the defendant herein, did knowingly and intentionally possess with the intent to distribute cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

The amount of cocaine attributable to defendant **Jose Coronel-Coss a/k/a “Sebastian Coronel”** was 500 grams or more of a mixture or substance containing a detectable amount of cocaine, thereby making the offense punishable under Title 21, United States Code, Section 841(b)(1)(B).

COUNT XX

The Grand Jury further charges that on or about August 23, 2023, in St. Louis County, within the Eastern District of Missouri,

JAVIER RAMOS-GARCIA,

the defendant herein, did knowingly and intentionally distribute cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

The amount of cocaine distributed by defendant **Javier Ramos-Garcia** was 500 grams or more of a mixture or substance containing a detectable amount of cocaine, thereby making the offense punishable under Title 21, United States Code, Section 841(b)(1)(B).

COUNT XXI

The Grand Jury further charges that on or about August 28, 2023, in St. Louis County, within the Eastern District of Missouri,

JAVIER RAMOS-GARCIA,

the defendant herein, did knowingly and intentionally possess with the intent to distribute cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

The amount of cocaine possessed by defendant **Javier Ramos-Garcia** with the intent to distribute was more than 500 grams of a mixture or substance containing a detectable amount of cocaine, thereby making the offense punishable under Title 21, United States Code, Section 841(b)(1)(B).

COUNT XXII

The Grand Jury further charges that on or about August 29, 2023, at a Park Avenue residence in the City of St. Louis, within the Eastern District of Missouri,

JEREMY JONES,

the defendant herein, did knowingly and intentionally possess with the intent to distribute fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

The amount of fentanyl possessed by defendant **Jeremy Jones** was 40 grams or more of a mixture of substance containing a detectable amount of fentanyl, thereby making the offense punishable under Title 21, United States Code, Section 841(b)(1)(B).

COUNT XXIII

The Grand Jury further charges that on or about August 29, 2023, in the City of St. Louis, within the Eastern District of Missouri,

JEREMY JONES,

the defendant herein, knowingly possessed a firearm on his person, to wit a Glock 30S, in furtherance of a drug trafficking offense which may be prosecuted in a court of the United States, that is conspiracy to distribute and possess Schedule II controlled substances, including fentanyl, as charged in Count I, and possession with the intent to distribute fentanyl, a Schedule II controlled substance, as charged in Count XXII, in violation of Title 18, United States Code, Section 924(c).

COUNT XXIV

The Grand Jury further charges that on or about August 29, 2023, at a Park Avenue residence in the City of St. Louis, within the Eastern District of Missouri,

JEREMY JONES,

the defendant herein, knowingly and intentionally possessed firearms, to wit:

- a) a Glock 23 .40 caliber handgun,
- b) a Pioneer Arms 7.62x39 rifle,
- c) a Konza .556 rifle,
- d) a Rock Island .45 caliber handgun,
- e) an American Tactical 7.62x39 rifle,
- f) a Glock 29 handgun,
- g) A Century Arms 7.62x39 rifle,

in furtherance of a drug trafficking offense which may be prosecuted in a court of the United States, that is conspiracy to distribute and possess with the intent to distribute Schedule II controlled substances, including fentanyl, as charged in Count I, and possession with the intent to distribute fentanyl, a Schedule II controlled substance, as charged in Count XXII, in violation of Title 18, United States Code, Section 924(c)(1).

COUNT XXV

The Grand Jury further charges that on or about August 31, 2023, in the City of St. Louis, within the Eastern District of Missouri,

ALLEN WALKER,

the defendant herein, did knowingly and intentionally attempt to possess with the intent to distribute cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Section 846.

COUNT XXVI

The Grand Jury further charges that on or about November 13, 2023, in St. Louis County, within the Eastern District of Missouri,

**ANICETO HERNANDEZ-SALINAS,
a/k/a “Brother-in-Law” and “Chester”**

the defendant herein, did knowingly and intentionally distribute methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1).

The amount of methamphetamine possessed by defendant **Aniceto Hernandez-Salinas a/k/a “Brother-in-Law” and “Chester”**, was 500 grams or more of a mixture of substance containing a detectable amount of methamphetamine, thereby making the offense punishable under Title 21, United States Code, Section 841(b)(1)(A).

COUNT XXVII

The Grand Jury further charges that on or about November 21, 2023, in St. Louis County, within the Eastern District of Missouri,

**ANICETO HERNANDEZ-SALINAS,
a/k/a “Brother-in -Law,” and “Chester”**

the defendant herein, did knowingly and intentionally distribute methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1).

The amount of methamphetamine possessed by defendant **Aniceto Hernandez-Salinas a/k/a “Brother-in-Law” and “Chester”** was 500 grams or more of a mixture of substance containing a detectable amount of methamphetamine, thereby making the offense punishable under Title 21, United States Code, Section 841(b)(1)(A).

COUNT XXVIII

The Grand Jury further charges that on or about December 20, 2023, in St. Louis County, within the Eastern District of Missouri,

ANDRES TABIMA-CORDOBA,

the defendant herein, did knowingly and intentionally possess with the intent to distribute cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT XXIX

The Grand Jury further charges that on or about December 27, 2023, in St. Louis County, within the Eastern District of Missouri,

RAMONA GARCIA-ARREOLA,

the defendant herein, did knowingly and intentionally distribute methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1).

The amount of methamphetamine possessed by defendant **Ramona Garcia-Arreola** was 500 grams or more of a mixture of substance containing a detectable amount of methamphetamine, thereby making the offense punishable under Title 21, United States Code, Section 841(b)(1)(A).

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 21, United States Code, Sections 853, upon conviction of an offense in violation of Title 21, United States Code, Sections 846 or 841 (a)(1), as set forth in Counts I, III – V, VIII – XIII, XV – XXII, and XXV – XXIX, the Defendants shall forfeit to the United States of America any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of the offenses; and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the offenses. Also subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds traceable to said offenses.

2. Pursuant to Title 18, United States Code, Sections 982(a), upon conviction of an offense in violation of Title 18, United States Code, Sections 1956, as set forth in Count II, the defendants shall forfeit to the United States of America any property, real or personal, involved in such offenses, or any property traceable to such property. Also subject to forfeiture is a sum of money equal to the total value of any property, real or personal, involved in said offenses, or is property traceable to such property.

3. Pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, upon conviction of an offense in violation of Title 18, United States Code, Section 1952 as set forth in Count XIV of the Indictment, the defendant shall

forfeit to the United States of America any property, real or personal, constituting or derived from any proceeds traceable to such violation(s). Also subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds traceable to said offense.

4. Pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), upon conviction of an offense in violation of Title 18, United States Code, Sections 922(g) or 924(c) as set forth in Counts VI, VII and XXIII, the defendants shall forfeit to the United States of America and any firearm or ammunition involved in or used in said violations.

5. Specific property subject to forfeiture includes, but is not limited to, the following:

- a. Approximately \$96,690.00 U.S. Currency;
- b. 2017 Jaguar F-Pace, VIN: SADCL2BV7HA099323;
- c. 2017 Chevrolet Silverado LTZ, VIN: 3GCUKSEC9HG282804;
- d. Approximately \$35,191.00 U.S. Currency;
- e. 2003 Suzuki GSX R1000K3, VIN: JS1GT75A432106793;

6. If any of the property, as a result of any act or omission of the defendant(s):

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL.

FOREPERSON

SAYLER A. FLEMING
United States Attorney

DANE A. RENNIER, #67299MO
JAMES C. DELWORTH, #29702MO
Assistant United States Attorneys